

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SUSAN CALVO, JOHN PETERS
PROFESSIONAL LIMOUSINES, INC.,
JACKLYN RESTREPO, PEDRO CAMACHO,
EAMON YUEL and YONG ZHANG individually
and on behalf of all others similarly situated,

Plaintiffs,

v.

THE CITY OF NEW YORK, MEERA JOSHI,
DAVID YASSKY and RAYMOND SCANLON,

Defendants.

14 Civ. 7246 (VEC)

DECLARATION OF JONATHAN HARRIS

JONATHAN A. HARRIS, an attorney duly admitted to practice law in the Courts of the State of New York and this Court, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury under the laws of the United States of America that the foregoing is true and correct:

1. I am an attorney admitted to practice before the courts of the State of New York, the U.S. District Courts for the Southern and Eastern Districts of New York, and the U.S. Court of Appeals for the Second Circuit, and I am also licensed to practice law in California. My firm is co-counsel for Plaintiffs and the proposed class in the above-captioned matter. As such, I am fully familiar with the facts and circumstances stated herein, and make this declaration in support of Plaintiffs' Motion for Class Certification.

2. I am the founding and managing partner of Harris, St. Laurent and Chaudhry LLP (the "Firm"). The Firm has 17 attorneys and specializes in litigation, including: commercial litigation, employment, civil rights, criminal defense and regulatory actions.

3. I am a 1984 graduate of Stanford University, *Phi Beta Kappa*, and a 1987 graduate of Stanford Law School, *Order of the Coif*. Following graduation, I clerked for Judge Thomas A. Griesa of the U.S. District Court for the Southern District of New York.

4. I have received numerous awards including being named a Super Lawyer for New York in the areas of litigation for the years 2011-2017, as one of the *Best Attorneys in America*, to the The National Trial Lawyers list of Top 100 Trial Lawyers in New York, and to the Nation's Top One Percent list by *The National Association of Distinguished Counsel*. In addition, I am a two-time winner of *ACQ Global Award's* Gamechanger of the Year for Litigation in New York; a two-time winner of *Corporate LiveWire's* Global Award Winner for Investor Litigation; and was named *American Lawyer's* Co-Litigator of the week in respect of a significant arbitration victory.

5. Prior to founding the Firm, I practiced law at Curtis, Mallet-Prevost, Colt & Mosle LLP with Peter Fleming Jr., and, later, at the prominent class action securities firm Bernstein, Litowitz, Berger & Grossmann LLP.

6. While at Bernstein Litowitz, the overwhelming focus of my practice was plaintiff-side class action litigation. I was one of the lead attorneys on numerous matters where the firm was appointed class counsel or co-class counsel, including: *In re State Street Bank and Trust Co. ERISA Litig.*, No. 07-cv-8488 (S.D.N.Y. 2007) (Holwell, J.); *Minneapolis Firefighters' Relief Ass'n v. Ceridian Corp*, C.A. No. 2996-CC (Del. Ch. 2008); *In re Dollar General Corp. S'holder Litig.*, No. 07-MD-01 (Tenn. Cir. Davidson Cnty. 2008); and *In re Yahoo! Inc. Takeover Litig.*, C.A. No. 3561 (Del. Ch. 2008). We resolved each of those matters (and others) on a class basis, and recovered hundreds of millions of dollars for victims of financial wrongdoing.

7. Since founding the Firm, I have continued litigating plaintiff-side class action cases. The Firm was appointed co-class counsel (with Caldwell, Leslie & Proctor, P.C., since acquired by Boies Schiller & Flexner L.L.P.) in *Duncan Living Trust et al. v. O'Connor Davies Munns and Dobbins, LLP, et al.*, No. BC494236 (Ca. Sup. Ct., L.A. Cty 2012). Judgment was entered settling this matter on a classwide basis on February 3, 2016. Likewise, the firm represented plaintiffs as co-counsel in a New York State-wide class action premised on wage and hour violations, *Hartley et al. v. Wells Fargo & Co., et al.*, 14-cv-05169, (EDNY) (JMA). This case was settled on a class basis earlier this year, with another firm acting as lead class counsel.

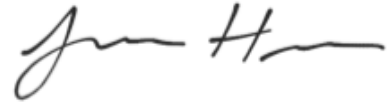
8. As more fully set forth in my partner Andrew St. Laurent's submissions in this case, lawyers at the Firm also have extensive experience litigating Section 1983 cases, including *Abdell v. City of New York*, 05-CV-8453 (SDNY) (RJS) and *Stern v. Shammas*, 12-CV-5210 (EDNY) (NGG).

9. I have been involved in developing plaintiffs' strategy in this case for some time, most prominently on issues relating to class certification. Based on the experience of the Firm and its lawyers in class action and Section 1983 litigation, I believe that the Firm is highly qualified to represent the putative class members as co-lead counsel, with Mr. Ackman, in this case.

10. In the event that the Firm is appointed class counsel in this case, we will vigorously represent the interests of the class members (as we have done to date), and will devote whatever resources are necessary to prosecute the action to a conclusion.

11. I have performed conflict checks. I am not aware of any conflicts of interest that would impede my or my firm's ability to represent the class members.

Dated: New York, NY
December 20, 2017

A handwritten signature in black ink, appearing to read "Jon Harris", written above a horizontal line.

Jonathan A. Harris